

MEMORANDUM

TO: Council, SSC and AP  
FROM: Jim H. Branson  
Executive Director  
DATE: January 23, 1984  
SUBJECT: Halibut Fishery Management

*ACTION REQUIRED*

- (a) *Report from the IPHC on its Annual Meeting.*
- (b) *Decide if regulations to promote a Bering Sea developmental halibut fishery are to be proposed for the 1984 season.*

BACKGROUND

- (a) A report on the 60th Annual Meeting of the IPHC will be given by a Commission representative.
- (b) At the December 1983 meeting, the Council considered a proposal to impose exclusive area registration, vessel size limits and a landing restriction in IPHC Area 4C. The proposal was submitted by representatives of the Pribilof and Nelson Islanders who are interested in developing a commercial halibut fishery in the Bering Sea north of 56°N latitude.

At the request of some of these representatives, discussion of the matter was tabled until this meeting provided they submitted a modified proposal by January 6, 1984. A proposal (Attachment 1) to create 12-mile fishing zones around the islands was received by Council staff on January 3, 1984. A draft Environmental Assessment prepared by Council staff was mailed to the Council family and addressees on the halibut mailing list on January 13, 1984.

The Environmental Assessment (Attachment 2) discusses three alternative regulations that would reduce or prevent halibut fishing in Area 4C by non-locals. Alternative 1 is the proposal the Council considered at the December 1983 meeting. It would establish exclusive area registration for any halibut vessel fishing Area 4C, impose a vessel size limit of 5 nt and require all halibut commercially harvested in 4C to be landed at ports located within that area. Any vessel used in 4C must be registered with NMFS/Alaska Region before the season and could not be fished in any other IPHC area.

The second alternative is based upon the new proposal received on January 3. This proposal would establish 12-nautical-mile exclusive registration zones around the three islands while imposing a maximum vessel size limit of 5 nt for these zones. Under this proposal, separate area quotas would be assigned to the fishery zones. The projected IPHC Area 4C quota for 1984, 400,000 pounds, would be divided between the Pribilof and Nelson Islands based upon expected abundance and the amount that can be taken in the zone. As in Alternative 1, any vessel registered for an exclusive zone could not be fished in other IPHC areas.

The third proposal is an alternative provided by Council staff. Under this measure, any vessel participating in the Area 4C halibut fishery would be limited to a maximum poundage per trip. The catch level can be set at this meeting after consideration of public comment, but should be low enough to discourage participation in the fishery by non-local fishermen. This proposal imposes no area registration requirements or vessel size limits and creates no special zones.

To aid you in your deliberations, a table has been provided by the IPHC (Attachment 3) on the levels of local and non-local participation in 4C over the last five years. Copies of written public comment on this matter are also provided (Attachment 4). Draft regulatory language for each alternative is included in the draft Environmental Assessment.

RECEIVED JAN 03 1984

AGENDA C-2  
ATTACH. #1

St. George Tanaq Corporation  
2604 Fairbanks Street  
Anchorage, Alaska 99503

and

Central Bering Sea Fishermen's Association  
General Delivery  
St. Paul Island, Alaska 99660

ACTION	ROUTE TO	INITIAL
	Exec. Dir.	J
	Gen. Del.	

December 27, 1983

North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, Alaska 99510

Att: Jim H. Branson, Executive Director

Dear Mr. Branson:

The St. George Tanaq Corporation and the Central Bering Sea Fishermen's Association, representing St. George Island and St. Paul Island, respectively, hereby submit the following proposal for consideration by the North Pacific Fishery Management Council for implementation during the 1984 halibut fishing season:

1. Within Area 4C, establish a 12 mile exclusive registration sub-area around St. Paul and St. George Islands, open to small boat, day fishermen. Fishing within this 12 mile sub-area will be open to all fishermen; however, fishermen who choose to fish in that area must do so exclusively.
2. Vessel size within the 12 mile sub-area will be limited to 5 net tons or less.
3. The fishing season within the 12 mile sub-area will begin June 1 and end September 1 or when the quota is reached. Throughout the season, fishing will be open 4 days and closed for one day.
4. The 1984 quota for the 12 mile sub-area will be 600,000 pounds.

We thank you for considering our proposal and we urge its adoption.

Sincerely,

St. George Tanaq Corporation  
Central Bering Sea Fishermen's Association, St. Paul

cc: International Pacific Halibut Commission

Bering Sea Fishermen's Association  
Senator Ted Stevens  
Senator Frank Murkowski

Rep. Donald Young  
Dr. Anthony Calio

# DRAFT

## ENVIRONMENTAL ASSESSMENT OF POSSIBLE REGULATION PROMOTING-- A DEVELOPMENTAL HALIBUT FISHERY IN THE BERING SEA

### INTRODUCTION

The Pacific halibut fishery is managed under the authority of the International Pacific Halibut Commission (IPHC) which was established by the Convention for the Preservation of the Halibut Fishery of the Northern Pacific signed by the United States and Canada in 1923. Subsequent Conventions were signed in 1930 and 1937. In 1953 the U.S. and Canada signed the present Convention for the Preservation of the Halibut Fishery of the Northern Pacific Ocean and Bering Sea. In early 1977, the Secretary of State, in cooperation with the Secretary of Commerce, determined that this Convention was inconsistent with the purposes, policy and provisions of the Magnuson Fishery Conservation and Management Act (Magnuson Act). As a result, the U.S. and Canada amended the Convention in March of 1979. The Northern Pacific Halibut Act of 1982 (Halibut Act), Pub. L. 97-176, was subsequently enacted to give effect to the 1979 Protocol.

The Halibut Act grants the relevant Regional Fishery Management Council (Council) authority to develop regulations applicable to that portion of the North Pacific halibut fishery conducted in U.S. waters. These regulations may include access limitation regulations but must not conflict with IPHC regulations. P.L. 97-176, Sec. 5(c). In recognition of the efforts by fishermen of the Pribilof and Nelson Islands to develop commercial halibut fisheries and the need for an economic base in that area, Congress included a proviso in the Halibut Act giving the Council discretion to accommodate a developmental fishery by rural coastal villagers of Alaska in the Bering Sea north of 56°N latitude. P.L. 97-176, Sec. 5(c). The Halibut Act's legislative history indicates the intent behind the developmental fishery provision is to aid in the economic development of the communities in that area.

The Pribilof and Nelson Islands lie within IPHC Area 4C (Figure 1). In 1983 the IPHC implemented regulations for this Area that were expected to allow the people of those communities the opportunity to harvest the majority of the area quota of 400,000 pounds. Under the 1983 regulations a vessel operator who was not a resident of Area 4C was required to obtain a vessel clearance in Dutch Harbor, Alaska, prior to fishing any opening in Area 4C. The regulations set four-day openings for the area with a one-day lay-up between openings. The intent of the regulations was to discourage participation by non-locals who would be required to take their vessels to Dutch Harbor and back between openings - a round trip of approximately 500 miles. Despite this intent, four non-local large-boat fishermen harvested 258,000 pounds of the quota, thereby ending the local small boat fisheries in mid-summer, well before expected. The regulations provided for a total of 76 fishing days in Area 4C; however, the season lasted only 27 days due to the harvest by non-local boats.

The North Pacific Fishery Management Council has been petitioned by representatives of the Pribilof and Nelson Islands to adopt regulations for the 1984 season that would ensure the Islanders catch the bulk of the Area 4C

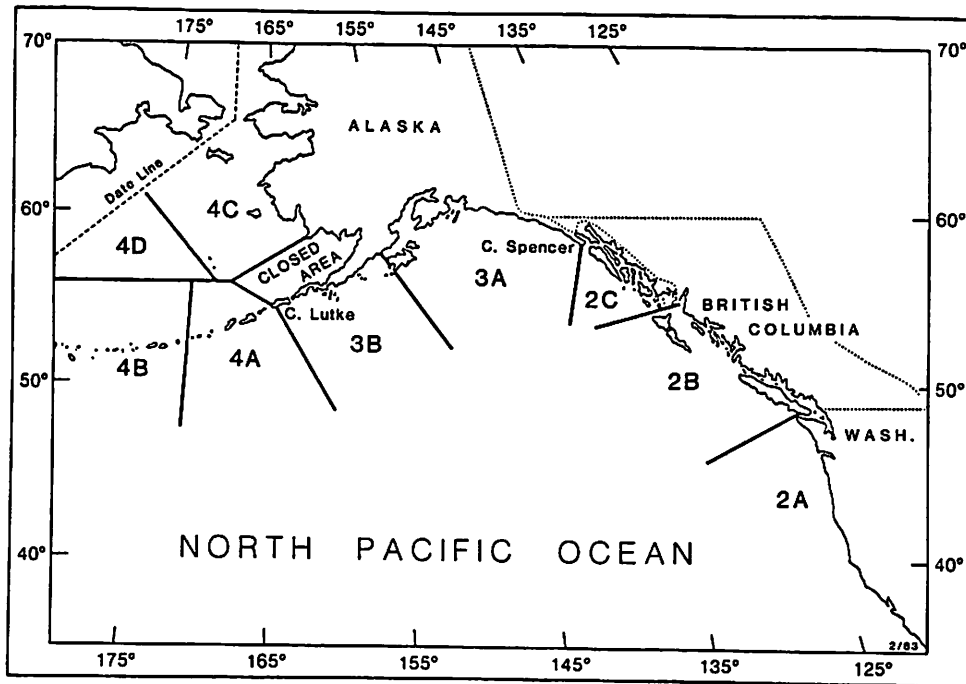


Figure 1. IPHC Regulatory Areas.

quota. At its December 1983 meeting, the NPFMC considered possible regulations for the developmental halibut fishery; however, at the request of representatives for the Islanders, discussion of the proposals was tabled until the February 1984 meeting.

This draft environmental assessment is prepared under Sec. 102(2)(C) of the National Environmental Policy Act of 1969 (NEPA) and its implementing regulations to determine whether an environmental impact statement must be prepared on a possible regulation to accommodate a developmental halibut fishery in IPHC Area 4C. This assessment considers three possible regulations the NPFMC may consider at its February, 1984 meeting. The common purpose of all three proposals is to allocate the Area 4C quota to the Pribilof and Nelson Islanders in order to aid economic development for this area.

#### HISTORY OF THE PACIFIC HALIBUT FISHERY IN THE EASTERN BERING SEA

Pacific halibut (hippoglossus stenolepis) are found on the continental shelf in the Bering Sea and in the North Pacific from California to Hokkaido, Japan. The longline fishery was initiated by U.S./Canadian fishermen off Washington and British Columbia in 1888, and by 1915 the total catch of Pacific halibut reached 69 million pounds. During the 1920s, the fishery expanded across the Gulf of Alaska as far west as Unimak Pass. By 1930, the Fleet had begun to harvest stocks in the eastern Bering Sea. The fishery in that area did not become fully developed, however, until the early 1960s. In 1962, under the aegis of the International North Pacific Fisheries Commission, the U.S. and Canada determined the halibut stocks in the eastern Bering Sea were not fully utilized by their own fleets and allowed the Japanese fleet access to the resource. In 1963 the INPFC, on its own initiative, set a catch limit of 11 million pounds for the region. This allowable catch was considered unrealistic by many and the stocks in the area were nearly destroyed in one season. Catches subsequent to 1963 were drastically reduced (Table 1) as a result of the overharvest.

Since the mid-1960s, there has been some recovery of the stocks in the eastern Bering Sea, but a substantial fishery has not been prosecuted in the area. In the area delineated by the IPHC as Area 4C, no more than six vessels per year have harvested halibut since the mid-1960s. These vessels have all been operated by fishermen who are not local to communities within Area 4C.

Until recently, eastern Bering Sea villagers have only caught halibut for subsistence purposes. They previously lacked the vessels, gear, and access to markets that would allow commercial harvest of the resource. The villagers of the Pribilof and Nelson Island communities do not have access to any viable commercial fishery other than halibut.

Within the past three years villagers in IPHC Area 4C have begun commercially harvesting halibut as part of an effort to develop local economies. Because the villages lack harbor facilities, these fishermen have been using small vessels (less than 5 net ton) that can be hauled ashore at the end of each fishing trip. The villagers fish within 12 miles of their village communities, conducting mostly a day fishery. Below is a brief description of the history of the commercial fishing efforts in each village community.

Table 1

Quota and catch (000's of pounds, dressed weight) by regulatory area, 1932-1976.\*

Year	AREA 1		AREA 2		AREA 3		AREA 4	
	Quota	Catch	Quota	Catch	Quota	Catch	Quota	Catch
1932		869	22,500	21,986	23,500	21,599		
1933		741	21,700	22,530	24,300	23,506		18
1934	1,400	1,614	21,700	22,363	24,300	23,569		
1935		1,492	21,700	22,067	24,300	23,784		
1936		714	21,700	22,605	24,300	25,604		
1937		714	21,700	23,359	24,300	25,466		
1938		718	22,700	23,391	25,300	25,444		
1939		1,091	22,700	24,499	25,300	25,313		
1940		825	22,700	25,578	25,300	26,978		
1941		349	22,700	23,941	26,300	27,941		
1942		290	22,700	23,144	26,800	26,954		
1943		428	23,000	24,933	27,500	28,338		
1944		326	23,500	26,023	27,500	27,086		
1945		443	24,500	23,353	28,000	29,594		5
1946		574	24,500	28,594	28,000	31,098		
1947		409	24,500	27,330	28,000	27,961	500	
1948		259	25,500	27,568	28,000	27,737	500	
1949		385	25,500	26,027	28,000	28,613	500	
1950		377	25,500	26,620	28,000	30,237	500	
1951		289	25,500	30,309	28,000	25,447	500	
1952		320	25,500	30,488	28,000	31,202		252
1953		210	25,500	32,501	28,000	26,899		227
1954		551	26,500	36,240	28,000	33,751		41
1955		377	26,500	27,429	28,000	29,670		45
1956		325	26,500	34,772	28,000	31,229		262
1957		296	26,500	30,238	30,000	30,281		39
1958		212	26,500	29,998	30,000	32,122		2,176
1959		129	26,500	30,401	30,000	36,517		4,157
1960		238	26,500	31,520	30,000	34,198		5,649
1961		223	28,000	28,637	33,000	36,446		3,968
1962		275	28,000	28,443	33,000	38,222		7,322
1963		169	28,000	26,001	34,000	36,931	11,000	8,136
1964		104	25,000	19,465	38,000	37,887	6,393	2,328
1965		98	23,000	24,154	38,000	37,589		1,335
1966		81	23,000	23,178	36,500	37,562		1,195
1967			23,000	19,719	36,500	33,108		2,395
1968			23,000	16,394	35,500	30,879		1,321
1969			21,000	22,377	34,500	34,665		1,233
1970			20,000	19,885	33,000	33,919		1,134
1971			20,000	16,773	33,000	29,015		866
1972			15,000	16,283	25,000	25,869		732
1973			13,000	12,929	25,000	18,525		286
1974			13,000	10,744	12,000	10,125		437
1975			13,000	13,830	12,000	13,261		525
1976			13,000	13,048	12,000	13,964		523

\* The catch includes poundage taken during special seasons without quotas or from permit fishing. Area 1 was incorporated as part of Area 2 in 1967. The quotas for Area 3 from 1964 to 1971 include quotas for Area 3E, which was managed separately in those years. Japanese longline catches in Area 4 are not included. The quotas for Area 4 in 1963 and 1964 also applied to the Japanese fleet.

St. George Island

Residents of St. George Island began commercially harvesting halibut in 1982 when 20 fishermen using 10 skiffs (14 ft.-18 ft.) and hand-jigs landed over 14,500 pounds. The fish were purchased from the fishermen by the village corporation, St. George Tanaq, and brokered to Taiyo Fisheries Company, Ltd.

In 1983, 32 fishermen, most of whom used hand-jigs, landed over 94,000 pounds of halibut. These fish were processed on the island and shipped to markets outside Alaska. St. George Tanaq has spent over \$800,000 for the construction of a fish processing plant that has a 500,000 pound freezer storage capacity.

Plans for 1984 call for approximately 40 fishermen to participate in the fishery. In 1983 some fishermen purchased larger skiffs, 20 ft. in length, and plan to use small power-gurdies to haul longline gear. This will greatly increase their catch per unit effort. A 32-ft. vessel owned by the village corporation will also be used in the fishery in 1984.

St. Paul Island

The halibut fishery at St. Paul Island began as a demonstration project in 1981. Forty villagers fishing hand-jigs from skiffs landed over 10,000 pounds of halibut. Two 29-ft. boats rigged with longline gear were used as training vessels and landed another 8,000 pounds. Most of the product from the first year was sold in the Anchorage area.

In 1982, only 12 local residents harvested halibut during the commercial season. Because the weather was too rough for their small skiffs, they were only able to fish a few days and landed approximately 4,000 pounds.

The 1983 fishery at St. Paul saw a substantial expansion in the number of fishermen participating, to over 40, and the total landings, to 59,000 pounds. While most fishermen used hand-jigs from skiffs, by the end of the season eight vessels 29 ft. and over were being used to fish longline gear. The same number of fishermen that participated in 1983 are expected to fish during the 1984 season. Some of the villagers who used hand-jigs in 1983 are expected to use hand gurdies in 1984 to haul longlines from their skiffs.

St. Paul fishermen sell their halibut to Tanadgusix Village Corporation. The catch is processed on the island at a small freezing plant (200,000 pounds holding capacity) and then shipped to markets in the Los Angeles area.

Nelson Island

The residents of Toksook and Tununak on Nelson Island initiated a commercial halibut fishery in 1982. During that year, 35 villagers fishing out of skiffs with manually-operated hook-and-line gear landed approximately 11,000 pounds of halibut. In 1983, 42 fishermen participated in the fishery harvesting approximately 15,000 pounds. Between 50 and 60 village fishermen are expected to participate during the 1984 season.

Halibut harvested by the Nelson Islanders is marketed through the Nelson Island Fisheries Association and sold primarily within the state of Alaska. Approximately 60 percent of the product is sold in Nome, Bethel and Dillingham with the remainder marketed in Anchorage and Fairbanks.



DESCRIPTION OF AND NEED FOR THE POSSIBLE REGULATION

Without Council action to promote the developmental halibut fishery in Area 4C, there is a strong likelihood that, as in 1983, the majority of the catch quota in that area will be harvested by non-local fishermen and the local fishermen will be greatly restricted in the time they can fish. The Council may consider several management alternatives to accommodate the villagers in Area 4C. These alternatives are:

Alternative I

Establishing IPHC Area 4C as an exclusive registration area with a maximum vessel size limit of 5 nt and requiring all halibut commercially harvested in IPHC Area 4C be landed at ports within that area.

Under this alternative, any vessel fishing in Area 4C would have to register with NMFS/Alaska Region prior to the season and would not be able to fish in any other IPHC area. This would discourage non-local vessels from the practice of fishing one or two openings in 4C late in the season as a way to "top off" the year's harvest.

The vessel size limit would prevent the possibility of one or two large vessels fishing the entire season in 4C in hopes of taking most, if not all, the area quota. It is not uncommon for some of the larger halibut vessels to harvest over 200,000 pounds each for the season. The landing requirement that all fish harvested in 4C be landed within the area would prevent non-locals from using a large vessel with skiffs as a mothership operation in 4C.

Possible Regulatory Language:

50 C.F.R., SECTION 301.16      Vessel size limitation and registration

(a) A vessel may be used for the commercial harvest of halibut in Area 4C only if it is:

- (1) a vessel 5 net tons or less; and,
- (2) a vessel which has been, on or before \_\_\_\_\_, 1984, registered with the Director, Alaska Region, National Marine Fisheries Service, by providing the Regional Director of the State of Alaska Department of Fishing and Game vessel registration number, the name of the vessel owner and the name of the vessel operator.

(b) a vessel described in paragraph (a) of this section may not be used for the commercial harvest of halibut in any area other than Area 4C, and may land halibut only at ports located along the coast of Area 4C.

Alternative II

Creation of 12-nautical-mile fishery development zones around St. Paul, St. George, Nelson Islands with exclusive area registration, vessel size limit of 5 nt and separate harvest quotas for each zone.

The effect of the exclusive area registration and vessel size limit under this alternative would be the same as in Alternative I; however, the entire Area 4C would not be turned into an exclusive registration area with a vessel size

limit under this alternative. The quotas assigned to the fishery development zones would be based on the IPHC quota for Area 4C. It should be noted that most, if not all, the halibut harvested in Area 4C is actually harvested within 12 miles of the Pribilof and Nelson islands. Little, if any, halibut could be caught in any other area of 4C.

Possible Regulatory Language:

50 C.F.R., SECTION 301.1 Regulatory Areas.

(i) Area 4C includes all waters in the Bering Sea north of Area 4A and north of the closed area defined in Section 5 that are east of a line extending true northwest (315°) from a point at latitude 56°20' 00"N., longitude 170°0' 00"W., and includes the following sub-areas:

(1) Area 4C I includes all waters 12 nautical miles seaward of St. George Island;

(2) Area 4C II includes all waters 12 nautical miles seaward of St. Paul Island;

(3) Area 4C III includes all waters 12 nautical miles seaward of Nelson Island. (As an alternative, Area 4C III could be expanded to include all waters 12 nautical miles seaward of Nelson Island and neighboring Nunivak Island.)

SECTION 301.6 Catch Limits.

(d) The catch limit of regulatory Area 4C is divided as follows:

4C I and 4C II - 350,000 pounds\*

4C III - 50,000 pounds\*

\*These amounts are based upon a projected 1984 Area quota of 400,000 pounds. Should the quota change, the amounts assigned to each developmental zone would be modified or expanded accordingly.

SECTION 301.16 Vessel size limitation and registration.

(a) A vessel may be used for the commercial harvest of halibut in sub-areas 4C I, II and III only if it is:

(1) a vessel less than 5 nt or less; and

(2) a vessel which has been, on or before \_\_\_\_\_, 1984, registered with the Director, Alaska Region, National Marine Fisheries Service, by providing the Regional Director the State of Alaska Department of Fish and Game vessel registration number, the name of the vessel owner and the name of the vessel operator.

(b) A vessel described in paragraph (a) of this section may not be used for the commercial harvest of halibut in any area other than sub-areas 4C I, II and III.

Alternative III

Imposing a trip poundage limit on vessels fishing in IPHC Area 4C.

No exclusive area registration or vessel size limit would be imposed under this alternative but vessels choosing to fish in Area 4C would be restricted to a specific poundage limit for each fishing trip made during the halibut

season. The trip limit would be set after receipt of public comment on this draft environmental assessment, but would be well below the harvest level required by large boats to make a fishing trip profitable. The closest port of sale available to large halibut vessels fishing in Area 4C is Dutch Harbor, approximately 250 miles from the Pribilof Islands. If, for example, a large vessel were limited to 5,000 or 10,000 pounds per trip, there would be no economic incentive for non-local vessels to fish in 4C given the increase in operating costs resulting from 500-mile round trips to deliver catch in Dutch Harbor.

Possible Regulatory Language:

50 C.F.R., SECTION 301.15 Trip Poundage Limit.

(a) "Fishing Trip" means a period of time during which fishing is conducted beginning when the vessel leaves port and ending when the vessel lands fish.

(b) "Trip Limit" means the total allowable amount of halibut by weight which may be landed from a single fishing trip. All weights shall be computed as with heads on and entrails removed.

(c) The trip limit for a vessel engaged in fishing for halibut in Area 4C is \_\_\_\_\_ pounds.

The common purpose served by all of the above-described alternatives is to deter participation in Area 4C by vessels not local to that area. Implementation of any of the alternatives or their variations would be intended to render participation in Area 4C by a non-local fisherman economically impractical.

Without the adoption of any of the alternatives, non-local fishermen could bring their vessels into the area and harvest the majority of the quota as they did in 1983 and curtail the developmental fishery. Should that happen, it will greatly impede, or make it impossible, for the local communities to continue development of a local halibut fishery as a means to augment their troubled economies.

Non-local vessels that have fished in Area 4C in the past and may wish to do so in the future are large enough to fish in any portion of Convention waters (Figure 1) while the small vessels owned by Area 4C villagers may only be safely used within a few miles of their communities. They cannot use larger vessels because none of the communities have harbor facilities; consequently, the vessels must be small enough to haul out on the beach at the end of each fishing trip.

POSSIBLE ENVIRONMENTAL IMPACTS

Impacts on the biological and physical environment.

The Pacific halibut fishery is managed under a quota system so that none of the alternatives considered should have a negative impact on the halibut resource as a whole. All the proposals would spread harvest effort in Area 4C over a longer period of time and could, therefore, reduce the risk of over-harvesting particular segments of the stock or the quota itself.

The current high level of effort in the Pacific halibut fishery has resulted in fishing seasons being drastically shortened. The large number of vessels fishing during such a short period of time often results in quotas being exceeded before the season is closed. In 1983, the U.S. catch of halibut in IPHC Area 2C exceeded the 3.4 million pound quota by nearly 3 million pounds, and in IPHC Area 3 the catch exceeded the 19 million pound quota by about the same amount. Exceeding various Pacific halibut quotas by these amounts may not be detrimental to the Pacific halibut resource as a whole because quota levels are set below equilibrium yields established for each IPHC regulation area; however, the current high level of fishing effort on Pacific halibut during very short periods of time each year may result in overharvesting of stocks that happen to be on the fishing grounds at that time, while leaving underutilized stocks that are on the grounds at other times of the year.

All of the alternatives are intended to limit the harvest effort in Area 4C to local small-boat fishermen who use manually operated hook-and-line gear or small power gurdies to haul longlines. These fishermen do not realize large daily harvests and, consequently, a longer period of time would be required to harvest the area quota under any of the alternatives than if the area was open to harvest by large, non-local vessels. With the effort spread over a long time span, catches could be closely monitored so there is little likelihood of the quota being exceeded.

#### IMPACTS ON THE SOCIO-ECONOMIC ENVIRONMENT

Each of the alternatives described above could have positive socio-economic consequences for the halibut fishermen of the Bering Sea communities in the area north of 56°N. The intent of the proposed regulations is to ensure these villagers are able to harvest most, if not all, of the catch quota for Area 4C. The 1984 quota for this area is projected to be 400,000 pounds and the average exvessel price for halibut is expected to be in excess of \$1 per pound. An infusion of over \$400,000 to the island communities would be an important step toward realization of the villagers' plans to develop private income sources as an alternative to government assistance programs.

Currently, there is little permanent employment in the villages in this area. The economies of these areas can be classified as predominantly subsistence with some part-time employment.

Full-time employment available to residents of Nelson Island is limited to work as village health aides or teachers' aides. Villagers are mainly dependent upon occasional government-funded summer construction projects as income sources. Halibut fishing has a potential of becoming a viable source of income to supplement the local subsistence economy. No other commercial fisheries are available locally to the residents of Nelson Island and they lack vessels that would allow them to fish in other waters. Because they have no harbor facilities, they are unable to use vessels larger than their 16'-18' skiffs.

On St. George Island there are only 15-20 full-time jobs available to a population of approximately 160. These jobs are with either the village corporation, village council or the government. The villagers have expended considerable time and resources to take advantage of the rich fishing grounds surrounding their island. Over \$800,000 has been spent on the construction of a processing facility that is due to be expanded this year. Because the island has no harbor facilities the local fishermen must use small skiffs that can be hauled ashore at the end of each fishing trip. This constraint limits the fishermen to harvesting only commercial fishery resources in the immediate vicinity of the island. Because of the relative abundance of stocks and the modest capitalization required, halibut has the greatest near-term potential as a source of fishing income. In 1983 sales of halibut by St. George Tanaq resulted in a gross income of over \$130,000.

For 590 St. Paul Islanders, there are only approximately 45 full-time jobs available. Some summer employment is available from a limited tourist trade (approximately 15 part-time jobs) and the annual fur seal hunt in July supports over 90 jobs in the harvest and processing of pelts and by-products). St. Paul Islanders, like the residents of St. George, hope to take advantage of their geographical location to develop a local commercial fishery. Also, like St. George they are limited to the use of small boats because they have no harbor facilities. Halibut, therefore, represents the only viable commercial fishery resource that is available to them in the near-term. In 1983 the St. Paul residents realized approximately \$61,500 in gross income from the halibut fishery. Over 150 households on both St. Paul and St. George Island received income from the 1983 halibut fishery.

Arguably, the few non-local fishermen who have fished Area 4C in the past and may wish to do so in the future could be adversely effected by any of the alternative regulations. Because the effect of these regulations would be to preclude their participation in that area, it could be said they would suffer economically; however, because substantial quotas are accessible to these vessels in other areas, and the number of non-local vessels that have fished in Area 4C in recent years is low (no more than six vessels per year), any negative economic impacts would be minor compared to the benefits generated for the local residents. The non-local fishermen who have the capability to fish in Area 4C also are able to fish any other IPHC area in Alaska waters.

According to IPHC projections, the 1984 quotas in Areas 2 and 3 combined will be over 45 percent greater than they were in 1983 (Area 2 - 16 million pounds in 1984 and 9 million pounds in 1983; Area 3 - 25 million pounds in 1984 and 19 million pounds in 1983). The Area 4C quota for 1984 is projected to be the same as it was in 1983, 400,000 pounds. As described above, this is the only viable commercial fishery accessible to residents of the area.

Should any measure selected increase the commercial halibut harvest by the villagers, the beneficial primary and secondary impacts generated for these individuals would appear to be of far greater significance to the local communities than like benefits could generate in non-local communities which have access to other halibut areas and commercial fishery resources. In addition to fishing income and employment directly attributable to the halibut catch, processing and other support service employment has been created. As described above, few employment opportunities are currently available to the villagers.

EFFECTS ON ENDANGERED SPECIES AND ON THE ALASKA COASTAL ZONE

None of the alternatives would constitute an action that may affect "endangered or threatened species or their habitats" within the meaning of the regulations implementing Section 7 of the Endangered Species Act of 1973. For this reason, consultation procedures under Section 7 will not be necessary on the intended action and its alternatives.

None of the alternatives would be a federal action directly affecting the Alaska Coastal Zone within the meaning of Section 307(c)(1) of the Coastal Zone Management Act of 1972 and its implementing regulations.

FINDINGS OF NO SIGNIFICANT ENVIRONMENTAL IMPACT

For the reasons discussed above, it is hereby determined that neither approval nor implementation of any of the alternatives concerning the developmental halibut fishery in the Bering Sea would significantly affect the quality of the human environment and that the preparation of an environmental impact statement on these actions is not required by Section 102(2)(C) of the National Environmental Policy Act or its implementing regulations.

\_\_\_\_\_  
Assistant Administrator for Fisheries, NOAA

\_\_\_\_\_  
Date

AGENCIES AND PERSONS CONSULTED

The purpose of this draft environmental assessment is to solicit comments from the public and government agencies. After an appropriate review of this draft, a final environmental assessment will be written which incorporates qualified or appropriate comment. Persons and agencies consulted during the review of this draft environmental assessment will be listed at that time.

REFERENCES

Bell, F. Heward, The Pacific Halibut: The Resource and the Fishery. Alaska Northwest Publishing Company, Anchorage, Alaska. 1981, 267 pp.

IPHC Technical Report No. 15, Regulations of the Pacific Halibut Fishery 1924-1976. 1977

IPHC Technical Report No. 16, The Pacific Halibut: The Biology, Fishery and Management. 1978

IPHC Report No. 35, Investigation Utilization, and Regulation of the Halibut in Southeastern Bering Sea. 1964

LIST OF PREPARERS

This draft environmental assessment was prepared by Ronald W. Miller, Special Advisor and Douglas Larson, Economist, North Pacific Fishery Management Council, P.O. Box 103136, Anchorage, Alaska 99510 (907)274-4563.

Number of vessels, number of landings and catch in thousands of pounds  
for Area 4C for the years 1979-1983\*

Year	Vessel Class	No. of Vessels	No. of Landings	Catch in 000's lbs.
1979	Licensed	5	6	180
1980	Licensed	3	3	93
1981	Non-licensed			
	St. Paul	11	82	19
	Licensed	8	11	283
Total		19	93	302
1982	Non-licensed			
	Nelson Island	32	120	7
	St. Paul	7	19	4
	St. George	14	81	15
	Licensed	7	7	225
	Total	60	227	251
1983*	Non-licensed			
	Nelson Island	65	304	15
	St. Paul	30	247	60
	St. George	24	279	97
	Licensed	4	6	258
	Total	123	836	430

Source: IPHC

\*Preliminary



Kelly C. Brennan  
Box 3506

RECEIVED JAN 17 1984

<b>NOTICE</b>	Homer, Ak. 99603
January 7, 1984	

Dear Members of the Council,

It has recently been brought to my attention of the move by the Pribilof Island natives to gain exclusive registration for their area. I was born and raised in Alaska, still live here and hope to remain fishing here. I am a member of Fishing Vessel Owner's Association and own the 72' halibut schooner "Eclipse".

With her I have fished the Pribilof Is. area. I oppose this issue proposed by these natives or any such claim by any peoples of American citizenry. I am afraid that this could set a devastating precedent of many other areas that are vital halibut fishing grounds and would affect 75% of the halibut fleet. A few of the other areas that could become prohibited from fishing are Akun, Akutan, Sand Point, Chignik and Kodiak. With the present instability in the fishery, I think it is very unwise to further increase the odds against the billions of dollars invested by the processors, fish brokers, fish markets, the fishermen and their multi-million dollar commercial halibut fleet by letting this proposal pass.

We should now also make a stand for the halibut moratorium and/or limited entry program. I am in favor of such a program. The halibut mania is not helping anyone. A vast number of ill-equipped boats and in-experienced fishermen are forcing poor quality fish on the consumer. Many do not realize that 80% of the damage to the product is inflicted during the first 12 hours after it is caught. Fish are piled high, left on deck for hours without being dressed, then piled still higher with older fish when delivered to dockside. The processors are forced to do this when fish arrive all at one time and in huge volume. I have personally seen halibut piled on the cold storage floor in large volume at Sand Point, Kodiak, Seward, Cordova, Sitka and Petersburg.

Millions of dollars have been invested in the halibut industry, most of it on credit. If the moratorium does not go through to limit the effort on the fishery, most of these boats, including myself, will go broke and default on their loans. This will cause serious financial hardship on the moneylenders as well. The pie can only be sliced so thin before everybody starves!

Sincerely,

Kelly C. Brennan

A handwritten signature in cursive script that reads "Kelly C. Brennan". The signature is written in dark ink and is positioned below the typed name.

**FISHING VESSEL OWNERS' ASSOCIATION  
INCORPORATED**

RECEIVED JAN 24 1984  
ROOM 232, C-3 BUILDING  
FISHERMEN'S TERMINAL  
SEATTLE, WASHINGTON 98119  
(206) 284-4720

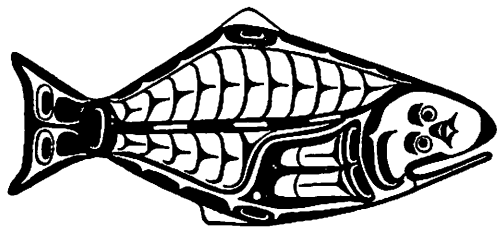
ACTION	ROUTE TO	INITIAL
	Exec. Dir.	
	Assoc. Dir.	
	Public Aff.	
January 16, 1984		

Mr. James O. Campbell, Chairman  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, Alaska 99510

Mr. James Campbell:

This petition is signed by the following vessel owners being members of the Fishing Vessel Owners Association and who are opposed to any regulation from the Council that would give the residence of the Pribilof and Nelson Islands exclusive fishing privileges in the IPHC area known as 4c. The proposals submitted in the Council letter of January 13, 1984 violate the national standards by trying to give the inhabitants of the Pribilof and Nelson Islands the sole right to harvest the resource in the 4C area. The Council notification less than two weeks before the Council meeting in Juneau to the halibut industry of a major ruling such as exclusive fishing areas is procedurally a shame.

Name	Vessel
<u>Maurice J. Jensen</u>	<u>F/V TORPENSJOLD</u>
<u>Jack D. Knutson</u>	<u>F/V GRANT</u>
<u>W. D. Smith</u>	<u>F/V HOOVER</u>
<u>M. J. Ness</u>	<u>F/V CAROL M</u>



Name

Vessel

<u>Allen Hanson</u>	<u>M/V Capri</u>
<u>Ed Hark</u>	<u>MV. VALIANT</u>
<u>Ralph Erickson</u>	<u>MV Vivian</u>
<u>Norman R. Leung</u>	<u>MV MOUNT PAULOF</u>
<u>Clay Mathem</u>	<u>F/V BARBARA JEAN</u>
<u>Charles S. Searcy</u>	<u>M.V. P.S. EBYORE</u>
<u>David M. Alhady</u>	
<u>Carl Hara</u>	<u>NORTH</u>
<u>David Bone</u>	<u>JIMMY BOY</u>
<u>Paul W. Marting</u>	<u>M/V FREELIND</u>
<u>Paul H.</u>	<u>marting</u>
<u>Jim Lee</u>	<u>Polaris</u>
<u>Paul J. Kaldatus</u>	<u>"Silver Dolphin"</u>

Name

Vessel

Herbert Larsen Gayle

Paul V. Edwards Guardian

Jack Flagg Favorite

Lito Berg Elaine B.

Bill Hansen Cheri H.

Dale Christensen GEORGIA

John Larson North

H.W. Wason L. Lou B.

Harold A. Rice Bering Star

Agnes Blumheim Judi B.

Name

Vessel

Frank Johnson EQUATOR

Ann Lee Evening Star

Ray Olsen St John # - Lovick

Otto Janggaard Alita

Harold Ann Smart

Al Ann Northwyn

Kris O'Horten Maddock

Elmer Mathews Larlei #

Ole Seters "HOOPER"

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Name

Vessel

Ste. Janggaard Cape Flattery

Per Olegard Vanssee

Bernad Amoyf Sylvia

Mils Cægaard Vanssee

Bernad A. Kuvog Sandra R.

Morris Lee Kuvog Silas

Pat Selfredy Vinnick

Name

Vessel

Harold Green M/V Coolidge

Dean Adams Quest

Pete Knutson Northern

John Sosvik SEYMOUR

John Crowley "KRISTINE"

Jack E Crowley "Spring Challenger"

Sam Peterson Diagrams

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Name

Vessel

Arnold E. Eismo Polarix

Arne E. Eismo "Polarix"

Helmut G. Opolka DAILY

Lloyd J. Larsen Vigorous

David Blem atlu

Otto Bogen Vigorous

Michael J. Falk Masonic



# ATXAM CORPORATION

ATKA RURAL BRANCH  
ATKA, ALASKA 99502  
PHONE: (907) 767-8001

## ATKA FISHERIES "HALIBUT"

Mr. Chairman, Members of the Commission, we thank you for listening to our presentation on halibut fisheries for Atka. We are the official representatives for the Atka fishermen and are primarily interested in Area 4B which is in good biological shape for halibut and can sustain increased fishing by smaller day boat that the fishermen of Atka use without endangering the resource one bit.

The fishermen of Atka are requesting a quota of 200,000 pounds of 1984 halibut to be allocated to the village day boat fishing in Atka and set up a developing fisheries for halibut in Amlia and Atka Island sub-area.

There are experienced fishermen in Atka who have fished for halibut in areas like Kodiak and Unalaska for many years; some as much as 20 years. We also have men who have fished halibut for their own use annually. There are 15 to 18 boats (small skiffs) varying in size:

14 to 16 footers (aluminum)

13 to 15 footers (wood)

They use Evinrude motors for power, 25 to 35 horse power. These boats have holding capacities of 9 to 12 halibut, depending on the

size of the halibut. The fishermen will be using long line with 2 or 3 skates. The use of small boats and gear will upgrade the halibut crop in that we will have no loss of fish like the lines the big boats who use 50 or more skates and lose fish. By fishing this way we will be providing better quality of fish.

We have the potential market at Adak Naval Station for the halibut we catch, so we will not be interfering with the established markets in the Lower 48.

Since fishermen have been fishing this area all their lives, they know the best location for halibut fishing and they do most of the fishing in the shallow water, which bigger boats cannot do. We are requesting the Commission to establish a local fishing area to be fished by the small boats only. Again, the method we are going to use will improve the fish in that area.

Based on past information that we have on fishing in Atka, using 15 to 18 boats (a man to each boat) with long line 2 to 3 skates, the local fishermen have capability of catching 5 tons of halibut a day. We emphasize the fact that this method of fishing will improve on the halibut crop in the area.

We ask you gentlemen to seriously consider our request for Atka halibut fishery for 1984, and we thank you for listening to our concern.

Respectfully submitted,

---

George Kudrin, President  
ATXAM CORPORATION

GK:cv



January 4, 1984

Mr. Donald A. McCaughran  
International Pacific Halibut Commission  
P.O. Box 95009, University Station  
Seattle, Washington 98105

Dear Mr. McCaughran:

On behalf of the undersigned, I would like to take this opportunity to introduce to you a proposal for your consideration. The proposal calls for immediate action on the part of the IPHC and NPFMC to modify the management regime for the halibut resource to allow boats using traditional longline hook and line apparatus, for species other than halibut, to retain a small halibut bi-catch for commercial purposes.

The proposal, if adopted, would allow retention of an incidental catch of halibut in the amount of one (1) pound of halibut for every ten (10) pounds of longline caught sablefish and other groundfish species, including Pacific cod, Pacific Ocean perch, and other Rockfish.

While this approach may seem new or radical to some, it is in fact, a reinstatement of a system employed for over thirty years. Also, while one can anticipate hearing concern expressed by traditional halibut fishermen who have not yet diversified their operations, adoption of the proposal would further ensure attainment of the objectives set forth in the halibut management goals adopted by the NPFMC at its December, 1983 meeting. Additionally, the proposal, if adopted, will promote and encourage development of heretofore domestically underutilized species, a primary objective of the MFCMA.

Most importantly, we can no longer tolerate the wanton waste of such a valuable resource. With the increase in population of halibut, we are, under the current management scheme, discarding ever larger numbers of halibut. This is not only against our nature and conscience as fishermen, but also discredits our management credibility in the international arena. It also inhibits our ability to compete in the market place by preventing our fishermen from maintaining an economically viable operation solely to

preserve a single species that we are not prepared to fully utilize.

The undersigned all are now, or have been halibut fishermen. We have worked hard over the years in conjunction with IPHC to preserve the halibut resource. We have managed this resource as a single species. Such single species management is advised in certain situations; however, today, given the state of all of our fishery resources, I believe we should waste no time in modifying our management schemes to take into consideration multiple species. I fear that if we do not, we will lose control of the management of our fisheries resources and any foothold we have as a commercial fishery industry worldwide.

To enumerate, the objectives that would be accomplished by adoption of this proposal include the following:

1. Distribution of the longline hook and line halibut fishery in time and space by taking approximately ten (10%) percent of the halibut quota throughout the year and throughout the Gulf of Alaska.
2. Preservation of halibut as a hook and line fishery and encouragement of other hook and line fisheries by making the latter cost effective. Utilization and sale of the incidental halibut bi-catch can make the difference between a profitable and an unprofitable trip for a blackcod or rockfish fisherman.
3. Provide high quality fresh halibut year round. This situation will benefit the consumer and the processor/marketer as well as the fishermen.
4. Provide hook and line caught fish of various species to shoreside plants and marketing concerns year round. This opportunity will have a substantial positive impact on the shoreside processors.
5. Encourage a new domestic fishery in species heretofore thought uneconomical.
6. Provide an opportunity to smaller, near shore boats to diversify their operations both in species and time.
7. Help to control the halibut resource that is interfering with the crab and trawl fisheries in the Gulf and minimize the waste of a valuable resource.

In considering this proposal, I would ask you to take into account the following thoughts and comments:

First, such a proposal is not new, in fact from 1937 through 1966, blackcod fishermen were permitted a halibut bi-catch. It was dropped, not because of abuse, but because the biological viability of the fishery was threatened and drastic measures were required. The situation has now reversed itself; thus, reinstating a previously successful regulation that promises again to serve the industry well is advised.

Second, this program could be tested on a small scale, limited basis to immediately allow an opportunity to refine the program and test it without creating a turmoil.

Third, if limited to the Eastern Gulf, where only approximately 4,000 metric tons of groundfish are harvested each year, excluding halibut, the ten (10%) percent would only amount to 400 metric tons total of halibut. In the Central Gulf alone, 768 metric tons of incidentally caught halibut will be allowed to the domestic trawl fishery for a 6 month period! The foreign fishery catches over 1,000 metric tons in 6 months. Neither of these fisheries is permitted to retain this halibut, nonetheless it is believed that many animals are lost as a result of this practice. Should the groundfish harvest increase thus increasing the amount of allowable halibut bi-catch for retention, then one of the Federal objectives will have been realized: domestic development of an underutilized species fishery. If this objective is to be reached, then adjustments can be made to the halibut bi-catch allowance for foreign fishery to compensate.

Fourth, while such an extension of the season throughout the year will negatively impact the economics of the larger longliner that has heretofore engaged only in the halibut fishery, it will encourage that boat to diversify its operations, again, a rational goal and one identified by both the State and federal governments.

Finally, the North Pacific Fishery Management Council has reserved the sablefish resource to the domestic industry until October 7 at which time the fishery will be open to the foreign longline fleet if the quota has not been caught. This proposal would greatly aid the domestic industry in attaining its goal; however, to be of any use in 1984 it needs to be adopted immediately.



I look forward to having the opportunity to answer any questions you may have at your meeting this month in Anchorage. If you should have any questions before then, please do not hesitate to contact me at (907) 735-4261 in Pelican.

Respectfully submitted,

Jack Phillips	F/V Nancy K	Pelican, Alaska
Jim Guilmet	F/V Dawn L	Kodiak, Alaska
Ron Nyman	F/V Mar-Jo II	Juneau, Alaska
Tom Stewart	F/V Lady Kate	Petersburg, Alaska
Dexter Kyle	F/V Portlock	Sitka, Alaska
Jack Knutsen	F/V Grant	Seattle, Washington
John Philips	F/V Shamrock	Pelican, Alaska
Harold Aase	F/V Northwyn	Seattle, Washington

cc: Mr. Jim Branson



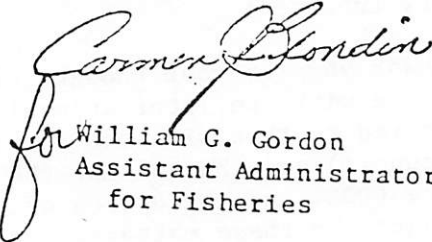


In the case of the halibut moratorium, fishermen were not in agreement. Although it appeared that Seattle and southeast Alaska groups reached a compromise, western Alaskan groups vociferously and articulately opposed the moratorium. The active involvement of fishermen, even when they disagree, is essential to the Council process and our responsibility to make sound decisions. I urge you to continue your involvement.

Regarding your concerns on conflict of interest, our policy is being developed by Mr. Kim White, Assistant General Counsel for Administration (207-377-5389). By copy of your letter and this response, we are asking him to provide you with any available information on this issue.

Thank you for sharing your thoughts with me. I hope my response gives you a better understanding of the Federal decisionmaking process.

Sincerely yours,

  
for William G. Gordon  
Assistant Administrator  
for Fisheries

cc: F(2), F/M11(2), GC(White), F/AKR, NPFMC

F/M11:NMFS:CBribitzer:634-7449:12/30/83:(ca Lundston) (d) (D4a)  
Revised:F/M11:CBribitzer:634-7449:1/5/84:ih (f)

HALIBUT



King of the Sea

# DEEP SEA FISHERMEN'S UNION

OF THE PACIFIC

5215 Ballard Avenue N.W. Seattle, Washington 98107



Phone 783-2922

Area code 206

December 5, 1983

William G. Gordon  
National Marine Fisheries Service-F  
National Oceanic and Atmospheric Administration  
Washington D.C., 20235

Dear Mr. Gordon:

Both as an individual fisherman and as a representative of the Deep Sea Fishermen's Union, an organization that, since 1912, has always taken an active role in fisheries management, I am writing to express concern about the Council system.

As you know, until OMB rejected the proposed moratorium on halibut, we were among the fishermen who actively organized our efforts with those of other industry members to educate ourselves, hammer out a unified position, and address the issue of overcrowding and overcapitalization in the halibut fleet. Those efforts have failed, for better or for worse, and we remain, actively pursuing a reasonable course of management for the halibut fishery in particular and the Alaska longline fisheries in general.

But, the action of OMB and the lack of a solid explanation for it (the requisites of Executive Order 12291, as well as the rationale of Mr. DeMuth's letter simply do not seem convincing) are examples of a trend that has made me, among many others that I know, doubtful of just how worthwhile any fisherman's involvement can be in the management of his business on a government level.

It seems that the original intent of the Council's function has been muddied by experience. Is it not supposed to know and deal more effectively with issues of its region than the upper echelons of the Executive branch in D.C.? If, on any given issue, the Department of Commerce and OMB see no real obligation to follow the directives of the Council, given that those directives have been developed according to the letter of the MFCMA, fisheries policy may as well be made from the Executive Office of the President.

In the 1920's, the Union was among the fishermen's groups to call for the establishment of the International Pacific Halibut Commission, a body necessary for the conservation and management of halibut. Since that time, the halibut fleet has practiced a great amount of self-regulation - fleet divisions, trip limits, and voluntary lay-ups, for example - that has been successful through the good and bad times of the last five or six decades. The Commission utilizes not only its scientific staff, but also its Conference Board of American and Canadian

William G. Gordon  
December 5, 1983  
Page 2

fishermen for recommendations on the seasons and quotas it sets. Seeing the need for proper maintenance of the stocks, we have been willing to regulate ourselves, and we have been heard by the Commission. Our input being generally effective, we have also seen the decisions made at the annual meeting suffer little or no meddling once they arrive for approval in Ottawa and Washington, D.C.; they are approved according to the adherence to the procedure described in the Halibut Convention, not according to political "correctness."

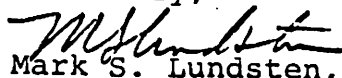
Unfortunately, I feel that the plans and decisions of the Council enjoy no such immunity to lobbying and pressure groups. The satisfaction of relevant participation by fishermen in the management of their fishery that we experience with the Halibut Commission is all but missing from the fishermen who have dealt with Council issues.

The North Pacific Council does seem to me to be doing a very good job. They are open to fishermen's ideas, have an efficient and capable staff, and are attempting truly to develop a viable managing body of the FCZ. But, Washington, D.C. does not appear too sympathetic to their cause, as evidenced in more ways than one. Some Management Plans literally have taken years to be approved. No one has given any of the Council or AP members a firm opinion on the controversy over conflict of interest, thus leaving many of us wondering "who" dares to vote on "what" without risking a lawsuit. Plus, the Department of Commerce and OMB both seem equally interested in the opinions of lobbyists and pressure groups in their own town as in the decisions the Council gives them.

Besides the familiar cry "kick the foreigners out," the seemingly most popular statement about fisheries management made by both industry and government is "let the fishermen get together and reach their own consensus," certainly an admirable intention. Sadly, many fishermen feel that to spend all the time and energy that we do on meetings, debating, and compromising is difficult enough. To have our efforts casually swept away by an office that has very little actual knowledge of commercial fishing is to suffer no small measure of futility.

My point is simple: the Council process relies on the good faith of all parties involved. If we plan to manage successfully the 200-mile zone of our oceans, we need to encourage the education and input of fishermen, and not the careless manipulation of them.

Sincerely,

  
Mark S. Lundsten,  
President

MSL:rd

RECEIVED JAN 26 1984

Box 904

PETERSBURG, ALASKA

20 JAN 84

99833

ACTION	ROUTE TO	INITIAL
	Exec. Dir.	
	Deputy Dir.	
	Admin. Off.	
	Exec. Sec.	
	Dist. 1	
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	Dist. 30	

AGENDA C-2(b)  
SUPPLEMENTAL

Mr Jim BRANSON  
EXECUTIVE DIRECTOR  
N.P.M.C.,  
ANCHORAGE, ALASKA

Dear Mr BRANSON:

WHAT IS THIS! I JUST RECEIVED A LETTER STATING A SPECIAL SEASON FOR AREA 4C. WHY CAN'T WE HAVE A SPECIAL SEASONS FOR 2C? (SAY 100 000 LB FOR ALL 45' X 12' BOATS)

I STRONGLY OPPOSE ALL SPECIAL SEASONS UNTIL WE CAN CONTROL THE FISHERY

IF YOU GUYS CONTINUE TO LET LAWYERS DO THIS FOR SPECIAL INTEREST GROUPS YOU WILL HAVE THE FISHERIES IN WORSE SHAPE THAN THEY ARE NOW.

AS FOR AREA 4C THEY GOT 27 FISHING DAYS, I GOT 5. I USE TO MAKE MY ENTIRE LIVING FROM HALIBUT, NOW I HAVE TO CRAB. LET'S QUIT ALL SPECIAL SEASON & LET US ALL BE EQUAL.

Sincerely,

*John A. Suensson*  
JOHN A. SUENSSON

January 4, 1984

Mr. Donald A. McCaughran  
International Pacific Halibut Commission  
P.O. Box 95009, University Station  
Seattle, Washington 98105

Dear Mr. McCaughran:

On behalf of the undersigned, I would like to take this opportunity to introduce to you a proposal for your consideration. The proposal calls for immediate action on the part of the IPHC and NPFMC to modify the management regime for the halibut resource to allow boats using traditional longline hook and line apparatus, for species other than halibut, to retain a small halibut bi-catch for commercial purposes.

The proposal, if adopted, would allow retention of an incidental catch of halibut in the amount of one (1) pound of halibut for every ten (10) pounds of longline caught sablefish and other groundfish species, including Pacific cod, Pacific Ocean perch, and other Rockfish.

While this approach may seem new or radical to some, it is in fact, a reinstatement of a system employed for over thirty years. Also, while one can anticipate hearing concern expressed by traditional halibut fishermen who have not yet diversified their operations, adoption of the proposal would further ensure attainment of the objectives set forth in the halibut management goals adopted by the NPFMC at its December, 1983 meeting. Additionally, the proposal, if adopted, will promote and encourage development of heretofore domestically underutilized species, a primary objective of the MFCMA.

Most importantly, we can no longer tolerate the wanton waste of such a valuable resource. With the increase in population of halibut, we are, under the current management scheme, discarding ever larger numbers of halibut. This is not only against our nature and conscience as fishermen, but also discredits our management credibility in the international arena. It also inhibits our ability to compete in the market place by preventing our fishermen from maintaining an economically viable operation solely to



preserve a single species that we are not prepared to fully utilize.

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To enumerate, the objectives that would be accomplished by adoption of this proposal include the following:

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3. Provide high quality fresh halibut year round. This situation will benefit the consumer and the processor/marketer as well as the fishermen.
4. Provide hook and line caught fish of various species to shoreside plants and marketing concerns year round. This opportunity will have a substantial positive impact on the shoreside processors.
5. Encourage a new domestic fishery in species heretofore thought uneconomical.
6. Provide an opportunity to smaller, near shore boats to diversify their operations both in species and time.
7. Help to control the halibut resource that is interfering with the crab and trawl fisheries in the Gulf and minimize the waste of a valuable resource.

In considering this proposal, I would ask you to take into account the following thoughts and comments:

First, such a proposal is not new, in fact from 1937 through 1966, blackcod fishermen were permitted a halibut bi-catch. It was dropped, not because of abuse, but because the biological viability of the fishery was threatened and drastic measures were required. The situation has now reversed itself; thus, reinstating a previously successful regulation that promises again to serve the industry well is advised.

Second, this program could be tested on a small scale, limited basis to immediately allow an opportunity to refine the program and test it without creating a turmoil.

Third, if limited to the Eastern Gulf, where only approximately 4,000 metric tons of groundfish are harvested each year, excluding halibut, the ten (10%) percent would only amount to 400 metric tons total of halibut. In the Central Gulf alone, 768 metric tons of incidentally caught halibut will be allowed to the domestic trawl fishery for a 6 month period! The foreign fishery catches over 1,000 metric tons in 6 months. Neither of these fisheries is permitted to retain this halibut, nonetheless it is believed that many animals are lost as a result of this practice. Should the groundfish harvest increase thus increasing the amount of allowable halibut bi-catch for retention, then one of the Federal objectives will have been realized: domestic development of an underutilized species fishery. If this objective is to be reached, then adjustments can be made to the halibut bi-catch allowance for foreign fishery to compensate.

Fourth, while such an extension of the season throughout the year will negatively impact the economics of the larger longliner that has heretofore engaged only in the halibut fishery, it will encourage that boat to diversify its operations, again, a rational goal and one identified by both the State and federal governments.

Finally, the North Pacific Fishery Management Council has reserved the sablefish resource to the domestic industry until October 7 at which time the fishery will be open to the foreign longline fleet if the quota has not been caught. This proposal would greatly aid the domestic industry in attaining its goal; however, to be of any use in 1984 it needs to be adopted immediately.

I look forward to having the opportunity to answer any questions you may have at your meeting this month in Anchorage. If you should have any questions before then, please do not hesitate to contact me at (907) 735-4261 in Pelican.

Respectfully submitted,

Jack Phillips	F/V Nancy K	Pelican, Alaska
Jim Guilmet	F/V Dawn L	Kodiak, Alaska
Ron Nyman	F/V Mar-Jo II	Juneau, Alaska
Tom Stewart	F/V Lady Kate	Petersburg, Alaska
Dexter Kyle	F/V Portlock	Sitka, Alaska
Jack Knutsen	F/V Grant	Seattle, Washington
John Philips	F/V Shamrock	Pelican, Alaska
Harold Aase	F/V Northwyn	Seattle, Washington

cc: Mr. Jim Branson

